

CERTIFIED TRUE COPY

ATTEST: William M. McCool (modified WD 10-26-18)

Clerk, U.S. District Court

Western District of Washington

By Travis Whiteley
Deputy Clerk

In the Matter of the Search of

(Briefly describe the property to be searched
or identify the person by name and address)Subject Accounts 1-7, which are maintained,
controlled or operated by Facebook, Inc., and further
described in Attachment ACase No. MJ19-5041

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

The Subject Accounts as further described in Attachment A, which is attached hereto and incorporated herein by this reference.

located in the Northern District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

Title 18, U.S.C. § 2423(b)
Title 18, U.S.C. § 2251(a)
Title 18, U.S.C. § 2252(a)(2)
Title 18, U.S.C. § 2252(a)(4)(B)

Offense Description

Travel with Intent to Engage in Illicit Sexual Conduct
Production of Child Pornography
Receipt/Distribution of Child Pornography
Possession of Child Pornography

The application is based on these facts:

- See attached Affidavit continued on the attached sheet

- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: by reliable electronic means; or: telephonically recorded.

Applicant's signature

SPECIAL AGENT KYLE McNEAL, FBI

Printed name and title

- The foregoing affidavit was sworn to before me and signed in my presence, or
- The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 03/20/2019

JUDGE'S SIGNATURE

City and state: TACOMA, WASHINGTON

THERESA L. FRICKE, United States Magistrate Judge

Printed name and title

ATTACHMENT A – Facebook, Inc. Accounts

The electronically stored data, information, and communications contained in, related to, and associated with, including all preserved data associated with Facebook, Inc. accounts:

- SUBJECT ACCOUNT 1: “Moeun Yoeun” (UID: 100014267529700)
- SUBJECT ACCOUNT 2: “Moeun Nobeatches” (UID: 100029529789553)
- SUBJECT ACCOUNT 3: “Moying Yoen” (UID: 100031404392100)
- SUBJECT ACCOUNT 4: “Moo Yo” (UID: 100000914824197)
- SUBJECT ACCOUNT 5: “Morin Yuin” (UID: 100034410908581)
- SUBJECT ACCOUNT 6: “J.C.” (UID: [REDACTED])
- SUBJECT ACCOUNT 7: “Y.C.” (UID: [REDACTED])

as well as all other subscriber and log records associated with the accounts, which are located at premises owned, maintained, controlled or operated by Facebook, Inc. a social media application provider headquartered at 1601 Willow Road, Menlo Park, California, 94025.

ATTACHMENT B

FACEBOOK, INC. ACCOUNTS to be Searched

I. Information to be disclosed

4 To the extent that the information described in Attachment A related to the
5 Facebook, Inc. accounts to be searched is within the possession, custody, or control of
6 Facebook, Inc., including any communications, records, files, logs, posts, payment
7 records, or information that has been deleted but is still available to Facebook, Inc., or
8 has been preserved pursuant to requests made under 18 U.S.C. § 2703(f), Facebook, Inc.
9 is required to disclose the following information to the government for each Facebook,
10 Inc. account identifier listed in Attachment A:

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ATTACHMENT B - 1
USAO #2019R00192

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 a. The contents of all communications associated with the accounts,
2 including stored or preserved copies of content sent to and from the account, draft
3 communications, the source and destination of any communications, the date and time at
4 which the communications were sent;

5 b. All records or other information regarding the identification of the
6 accounts, to include full name, physical address, telephone numbers and other identifiers,
7 records of session times and durations, the date on which the accounts were created, the
8 length of service, the IP address used to register the accounts, log-in IP addresses
9 associated with session times and dates, account status, alternative e-mail addresses
10 provided during registration, methods of connecting, log files, and means and source of
11 payment (including any credit or bank account number);

12 c. The types of service utilized;

13 d. All records or other information stored at any time by an individual
14 using the accounts, including address books, contact and buddy lists, calendar data,
15 pictures, files, and the contents of any accounts associated with the identified Facebook,
16 Inc. accounts; and

17 e. All records pertaining to communications between Facebook, Inc.
18 and any person regarding the accounts, including contacts with support services and
19 records of actions taken.

1 **II. Information to be seized by the government**

2 All information described above in Section I that constitutes fruits, contraband,
3 evidence, and instrumentalities of violations of 18 U.S.C. § 2423(b) (Travel with Intent to
4 Engage in Illicit Sexual Conduct), 18 U.S.C. § 2251(a) (Production of Child
5 Pornography), 18 U.S.C. § 2252(a)(2) (Receipt/Distribution of Child Pornography), and
6 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography), committed in or after
7 2012, including, for each account or identifier listed in Attachment A, information
8 pertaining to the following matters:

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1 a. All messages, documents, and profile information, attachments, or
2 other data that serves to identify any persons who use or access the accounts specified, or
3 who exercise in any way any dominion or control over the specified accounts;

4 b. Any address lists or “friend”/contact lists associated with the
5 specified accounts;

6 c. All images/videos of child pornography, any messages or documents
7 relating to the transmission of child pornography (including any attachments thereto), and
8 any profile information from other file- or photo-sharing websites;

9 d. All messages, communications, or other documents related to the
10 sexual exploitation or abuse of minors, travel for the purpose, or otherwise evidencing
11 contact with minors or individuals purporting to be or otherwise facilitate contact with
12 minors.

13 e. The types of services utilized;

14 f. All subscriber records associated with the specified accounts,
15 including name, address, local and long distance telephone connection records, or records
16 of session times and durations, length of service (including start date) and types of
17 service utilized, telephone or instrument number or other subscriber number or identity,
18 including any temporarily assigned network address, and means and source of payment
19 for such service) including any credit card or bank account number;

20 g. Any and all other log records, including IP address captures,
21 associated with the specified accounts; and

22 h. Any records of communications between Facebook, Inc., and any
23 person about issues relating to the accounts, such as technical problems, billing inquiries,
24 or complaints from other users about the specified accounts, including records of contacts
25 between the subscriber and the provider’s support services, as well as records of any
26 actions taken by the provider or subscriber as a result of the communications.

27 **Notwithstanding the criminal offenses defined under 18 U.S.C. §§ 2252 and 2252A,**
28 **or any similar criminal offense, Facebook shall disclose information responsive to**
this warrant by mailing it to Federal Bureau of Investigation, Attn: Special Agent

1 **Kyle McNeal at 1145 Broadway, Suite #500, Tacoma, WA 98402 or via email to**
2 **kmcneal@fbi.gov.**

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ATTACHMENT B - 5
USAO #2019R00192

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Facebook, and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Facebook. The attached records consist of _____.

RECORDS (pages/CDs/megabytes)]. I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Facebook, and they were made by Facebook as a regular practice; and

b. such records were generated by Facebook electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Facebook in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Facebook, and at all times pertinent to the records certified here the process and system functioned properly and normally.

1 I further state that this certification is intended to satisfy Rules 902(11) and
2 902(13) of the Federal Rules of Evidence.

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CERTIFICATE OF AUTHENTICITY - 2
USAO #2019R00192

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

AFFIDAVIT

STATE OF WASHINGTON

58

COUNTY OF PIERCE

I, Kyle McNeal, Special Agent, Federal Bureau of Investigation, being first duly sworn under oath, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been for approximately eight years. As part of my duties, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal production, distribution, receipt, and possession of child pornography and material involving the sexual exploitation of minors in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I am a graduate of the FBI Academy and have received further specialized training in investigating child pornography and child exploitation crimes. I have also had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256(8)). At this time, I have been assigned as the South Sound Child Exploitation Task Force (SSCETF) Coordinator and work with other federal, state, and local law enforcement personnel in the investigation and prosecution of crimes involving the exploitation of minors.

2. I make this Affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant for information associated with certain social media accounts as detailed below in paragraph 3 and further described in Attachment A.

3. Records and information associated with the Facebook accounts:

- SUBJECT ACCOUNT 1: “Moeun Yoeun” (UID: 100014267529700)
- SUBJECT ACCOUNT 2: “Moeun Nobeatches” (UID: 100029529789553)

- 1 • SUBJECT ACCOUNT 3: "Moying Yoen" (UID: 100031404392100)
- 2 • SUBJECT ACCOUNT 4: "Moo Yo" (UID: 100000914824197)
- 3 • SUBJECT ACCOUNT 5: "Morin Yuin" (UID: 100034410908581)
- 4 • SUBJECT ACCOUNT 6: "J.C." (UID: [REDACTED])
- 5 • SUBJECT ACCOUNT 7: "Y.C." (UID: [REDACTED])

6 that are stored at the premises controlled by Facebook, a social media platform
 7 headquartered at 1601 Willow Road, Menlo Park, CA 94025.

8 4. This affidavit is made in support of an application for a search warrant
 9 under 18 U.S.C. §§ 2703(a), 2703(b)(1)(A), and 2703(c)(1)(A) to require Facebook to
 10 disclose to the government copies of the information (including the content of
 11 communications) further described in Section I of Attachment B. Upon receipt of the
 12 information described in Section I of Attachment B, government-authorized persons will
 13 review that information to locate the items described in Section II of Attachment B.

14 5. The facts set forth in this Affidavit are based on my own personal
 15 knowledge; knowledge obtained from other individuals during my participation in this
 16 investigation, including other law enforcement officers; the review of documents and
 17 records related to this investigation; communications with others who have personal
 18 knowledge of the events and circumstances described herein; and information gained
 19 through my training and experience.

20 6. Because this Affidavit is submitted for the limited purpose of providing
 21 sufficient facts necessary to determine whether there is probable cause in support of the
 22 application for a search warrant, it does not set forth each and every fact that I or others
 23 have learned during the course of this investigation. I have set forth only the facts that I
 24 believe are relevant to the determination of probable cause to believe that evidence,
 25 fruits, and instrumentalities of violations of 18 U.S.C. § 2423(b) (Travel with Intent to
 26 Engage in Illicit Sexual Conduct), 18 U.S.C. § 2251(a) (Production of Child
 27 Pornography), 18 U.S.C. § 2252(a)(2) (Receipt/Distribution of Child Pornography), and
 28 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography).

I. SUMMARY OF INVESTIGATION

2 7. This investigation originated with a CyberTip report submitted by
3 Electronic Service Provider (ESP) Facebook to the National Center for Missing and
4 Exploited Children (NCMEC). NCMEC is a private, non-profit organization operating
5 under a congressional mandate to act as the nation's law enforcement clearing house for
6 information concerning online child sexual exploitation. In partial fulfillment of that
7 mandate, NCMEC operates a CyberTip line, a resource for reporting online crimes
8 against children. ESPs report to NCMEC, via the CyberTip line, whenever they discover
9 that a subscriber has violated their terms of service and/or used their services to transmit
10 child pornography or engage in sexual exploitation of minors.

11 8. Facebook identified four user accounts, all of which it linked to the same
12 individual, MOEUN YOEUN:

- SUBJECT ACCOUNT 1: “Moeun Yoeun” (UID: 100014267529700)
- SUBJECT ACCOUNT 2: “Moeun Nobeatches” (UID: 100029529789553)
- SUBJECT ACCOUNT 3: “Moying Yoen” (UID: 100031404392100)
- SUBJECT ACCOUNT 4: “Moo Yo” (UID: 100000914824197)

9. According to Facebook,

A 36-year-old male appears to be enticing minors to produce and send apparent child exploitation imagery (CEI) and engage in sexual activity via private messages. Conversations indicate that he may have travelled to the Philippines in order to engage in sexual activity with minors. Profile pictures and conversations also indicate that he may be in a position of public trust as an active member of the US military.

22 10. Facebook provided account content associated with SUBJECT
23 ACCOUNTS 1-3, including private messages between the user of those accounts
24 (YOEUN) and other Facebook user(s) in the Philippines. These communications show
25 that YOEUN intended to travel, and did in fact travel, to the Philippines to sexually abuse
26 young girls. YOEUN also sought sexually explicit visual depictions of girls and on
27 multiple occasions offered to pay to have people kidnapped, beaten, raped, and tortured.

1 11. The messages below were all exchanged by the user of SUBJECT
2 ACCOUNTS 1-3 and two different Facebook accounts (SUBJECT ACCOUNTS 6 and
3 7), both of which Facebook reported were used by someone in the Philippines. From
4 context, it seems clear that the same person is using SUBJECT ACCOUNTS 1-3. In the
5 excerpts below, SUBJECT ACCOUNT 6 is identified as J.C., and SUBJECT ACCOUNT
6 7 as Y.C.

7 October 14, 2018

8 SUBJECT ACCOUNT 1: You have girls 8

9 J.C.: **yes when meet?**

10 SUBJECT ACCOUNT 1: **Make video**

11 J.C.: **yes dad**

12 J.C.: **when you want**

13 SUBJECT ACCOUNT 1: **Now**

14 J.C.: **ok baby i send you later**

15 SUBJECT ACCOUNT 1: **How old**

16 J.C.: **after 2hours.**

17 J.C.: **12 or 11 yearsold**

18 SUBJECT ACCOUNT 1: **Face**

19 ***

20 SUBJECT ACCOUNT 1: **8 years old?**

21 J.C.: **yes dad wait**

22 J.C.: [Facebook reported that this user sent an image of a prepubescent girl]

23 SUBJECT ACCOUNT 1: **Name**

24 J.C.: [Facebook reported that this user sent an image of a prepubescent girl]

1 ***

2 SUBJECT ACCOUNT 1: **OK**

3 SUBJECT ACCOUNT1: “[NAME REDACTED] again”

4 J.C.: [Facebook reported that this user sent an image of a prepubescent girl]

5 ***

6 SUBJECT ACCOUNT 1: “[NAME REDACTED] will fuck”

7 J.C.: **yes dad,she waiting you**

8 J.C.: **she always ask me about u**

9 SUBJECT ACCOUNT 1: **Just two Little girls in video**

10 SUBJECT ACCOUNT 1: “Yes I will fuck [NAME REDACTED]”

11 J.C.: **when?**

12 J.C.: **yes**

13 SUBJECT ACCOUNT 1: **Beginning of November**

14 J.C.: **ok dad,she waiting always**

15 SUBJECT ACCOUNT 1: **How much to eat their pussies**

16 J.C.: **you dad.how much you give each girl?**

17 SUBJECT ACCOUNT 1: **2k each**

18 J.C.: **12y**

19 J.C.: **ok dad**

20 SUBJECT ACCOUNT 1: **You get little girls to stay with me one night**

21 SUBJECT ACCOUNT 1: **I want naked one night in my bed**

22 J.C.: **Yes dad.when meet?november?**

1 SUBJECT ACCOUNT 1: 11 November
2

3 J.C.: Yes dad how many little i bring?
4

5 SUBJECT ACCOUNT 1: Make sure all 7-9 years old
6

7 J.C.: "Ok, really sure ?you want [NAME REDACTED] is virgin?"
8

9 SUBJECT ACCOUNT 1: Yes and 3 others
10

11 J.C.: Yes dad i bring.
12

13 J.C.: "Yes but [NAME REDACTED] is one of I bring"
14

15 SUBJECT ACCOUNT 1: Yes of course
16

17 SUBJECT ACCOUNT 1: I'm gonna make her bleed
18

19 J.C.: Ok but 7-9 yearold eat pussy only?and if you want blowjob ?
20

21 ***
22

23 SUBJECT ACCOUNT 1: Yes I want to feel little girls suck dick
24

25 November 6, 2018
26

27 SUBJECT ACCOUNT 2: Chat me here it's moeun
28

29 J.C.: yes i know
30

31 SUBJECT ACCOUNT 2: "[NAME REDACTED] is ready?"
32

33 SUBJECT ACCOUNT 2: I'm gonna be her first?
34

35 J.C.: yes shes ready
36

37 SUBJECT ACCOUNT 2: I think gonna feel heaven
38

39 J.C.: yes bby.im excited and little girls
40

41 SUBJECT ACCOUNT 2: How old you give?
42

1 J.C.: “[NAME REDACTED] 12, [NAME REDACTED] 12, [NAME
2 REDACTED] 12”

3 SUBJECT ACCOUNT 2: **How much?**
4 ***

5 J.C.: **5k each eat pussy**

6 SUBJECT ACCOUNT 2: **All of them gonna suck me?**
7 ***

8 J.C.: **yes.i tell and i teach**

9 SUBJECT ACCOUNT 2: **Wow heaven**

10 **November 14, 2018**

11 SUBJECT ACCOUNT 2: **My dick is ready for the video**
12 ***

13 J.C.: **Is end u video but do jot send**

14 J.C.: **Later i send u again and 8 yearsold**

15 J.C.: [Sent a video that Facebook reported as apparent child exploitation material
16 in a separate CyberTip Report #47142073.¹]
17 ***

18 SUBJECT ACCOUNT 2: **Nice pussy**

19 SUBJECT ACCOUNT 2: **Yummy**

20 ***

21 SUBJECT ACCOUNT 2: **How old**

22 SUBJECT ACCOUNT 2: **I want to eat that**

23
24
25
26
27 ¹ The CyberTip Report, which included the video file uploaded and sent to SUBJECT ACCOUNT 2, does not
28 indicate whether Facebook viewed this file. As such, I have not reviewed this video to confirm whether it
constitutes child exploitation material as reported by Facebook.

1 SUBJECT ACCOUNT 2: You think she can handle getting fucked?

2 J.C.: Shes virgin.maybe she agree

3 SUBJECT ACCOUNT 2: Can I see the 8 years old.

4 **December 23, 2018**

5 SUBJECT ACCOUNT 3: "How is [NAME REDACTED]'s pussy"

6 SUBJECT ACCOUNT 3: I make it hurt lol

7 **January 8, 2019**

8 SUBJECT ACCOUNT 3: What girls you have right now

9 SUBJECT ACCOUNT 3: I want to cum

10 ***

11 SUBJECT ACCOUNT 3: I'm going there in February

12 ***

13 SUBJECT ACCOUNT 3: My phone number is +12533559252

14 SUBJECT ACCOUNT 3: "when I go to Philippines I can fuck [NAME
15 REDACTED]?"

16 **January 9, 2019**

17 Y.C.: Bby i have little.but she is very young

18 Y.C.: I think 6yearsold only.but picture only ?

19 SUBJECT ACCOUNT 3: That's very young

20 Y.C.: Yes.8y u want?

21 SUBJECT ACCOUNT 3: YES YES YES

22 SUBJECT ACCOUNT 3: My favorite

1 January 18, 2019

2 Y.C.: Hello bby, when video again? i have new little.

3 Y.C.: Beautiful and virgin. but shes 12 years old

4 SUBJECT ACCOUNT 3: I dont want 12 i want younger

5 February 6, 2019

6 Y.C.: "Hi dad im [NAME REDACTED] tomorrow you send"

7 Y.C.: [Facebook reported that Y.C. then sent three videos of apparent child
8 exploitation material, which was further documented in CyberTip Report
9 #47171078]

10 February 8, 2019

11 SUBJECT ACCOUNT 3: Capture her rape her and broke her face permanent damage

12 Y.C.: Rape is hard only broke face and body

13 SUBJECT ACCOUNT 3: Broken legs

14 Y.C.: Yes broken legs and broke face but not rape

15 SUBJECT ACCOUNT 3: Ok how much for that?

16 ***

17 Y.C.: 15 k? is maybe hard but im sure to broke face and legs

18 ***

19 SUBJECT ACCOUNT 3: Pay after finish?

20 Y.C.: Like if u send now do for tommorow suree

21 SUBJECT ACCOUNT 3: I dont send first

22 SUBJECT ACCOUNT 3: Last time i send nothing happen

23 Y.C.: Yess. send half i paid promise sure

1 SUBJECT ACCOUNT 3: What if kill?
2

3 Y.C.: You need more money for kill
4 ***
5

6 Y.C.: Bby dont kill. 😊 is bad
7

8 February 12, 2019
9

10 SUBJECT ACCOUNT 3: Baby i will see you tomorrrww
11

12 SUBJECT ACCOUNT 3: What time are you available ?
13

14 SUBJECT ACCOUNT 3: I go your house or hotel?
15

16 Y.C.: Morning and aftnoon im available.hotel only my house is small and i shy to u
17

18 Y.C.: I bring littles.2 little first?i bring
19

20 SUBJECT ACCOUNT 3: Ok baby
21

22 SUBJECT ACCOUNT 3: How old?
23

24 Y.C.: How many days are u hrre?
25

26 SUBJECT ACCOUNT 3: Until 17 feb
27

28 Y.C.: 9 and 11 first.
29

30 SUBJECT ACCOUNT 3: I'm going GO hotels north edsa
31

32 SUBJECT ACCOUNT 3: I'm leaving airport
33

34 February 16, 2019
35

36 Y.C.: Are u still in manila?
37

38 SUBJECT ACCOUNT 3: No I'm not anymore
39 ***
40

41 SUBJECT ACCOUNT 3: What girl you have
42 ***
43

1 Y.C.: 10 and 9. you want video bby?
2

3 SUBJECT ACCOUNT 3: Let me see face
4

5 February 17, 2019
6

7 SUBJECT ACCOUNT 3: How did the little girl like getting her pussy licked for the first time
8

9 12. As shown above, SUBJECT ACCOUNT 3 received three videos from Y.C.
10 on February 6, 2019. Facebook reported each video constituted apparent child
11 exploitation material and submitted CyberTip Report #47171078 to NCMEC
12 documenting this activity. I reviewed that CyberTip Report, which states that the three
13 files uploaded by Y.C. were viewed by Facebook prior to being submitted to NCMEC. I
14 reviewed these videos and describe each below:

15 Video 1: This video depicts a fully clothed minor female sitting down. She lifts up
16 her shirt and exposes her breasts to the camera. Based on her clothing, this female
17 appears to be the same prepubescent female who is one of two individuals
18 depicted in the videos described below.

19 Video 2: This video depicts two female minors. Based on their youthful
20 appearance, body size, lack of breast/pubic development, and lack of pubic/body
21 hair, I believe both are prepubescent. Both children are nude from the waist down.
22 Each minor is depicted rubbing her genitals during the video.

23 Video 3: This video depicts two female minors. Based on their youthful
24 appearance, body size, lack of breast/pubic development, and lack of pubic/body
25 hair, I believe both are prepubescent. Both children are nude from the waist down.
26 Each minor is shown rubbing her genitals with her fingers during the video.

27 13. Based on the content provided by Facebook, it appears that the same person
28 is the user of SUBJECT ACCOUNTS 1-3. As noted above, Facebook also identified
SUBJECT ACCOUNT 4 as another account linked to the same user. According to
Facebook, all four accounts are linked by machine cookies. Cookies are files placed on a
computer by a website. They are used for a variety of purposes, including tracking user
activities. A website like Facebook can place cookies on a user's computer and through
those cookies could potentially (and easily) note that multiple user accounts have used
the same computer.

1 14. The registration information associated with SUBJECT ACCOUNT 4
 2 showed that the user of that account registered with the email address,
 3 moeun.yoeun@us.army.mil. That user also listed his gender as male and provided his
 4 birthdate, XX/XX/1982. U.S. Department of Defense records show that MOEUN
 5 YOEUN is on active duty in the United States Army. He is a male and born on the same
 6 date as the user of SUBJECT ACCOUNT 4.

7 15. As shown above, the user of SUBJECT ACCOUNT 3 provided a telephone
 8 number during his communications with Y.C. U.S. Department of Defense records show
 9 that the email address associated with SUBJECT ACCOUNT 4 and the telephone number
 10 provided by the user of SUBJECT ACCOUNT 3 are both associated with U.S. Army
 11 Staff Sergeant MOEUN YOEUN, who recently served in South Korea.

12 16. Facebook provided IP address information for each of SUBJECT
 13 ACCOUNTS 1-4. These records showed that various IP addresses were associated with
 14 SUBJECT ACCOUNTS 1-4 between September 2018 and February 2019. In response to
 15 a summons, Comcast Communications reported IP addresses associated with each of
 16 SUBJECT ACCOUNTS 1-4 were assigned to MOEUN YOEUN at his residence in
 17 Steilacoom, Washington during this time.

18 17. On March 5, 2019, I obtained search warrants for YOEUN's home, car, and
 19 person from the Honorable Theresa L. Fricke of the United States District Court for the
 20 Western District of Washington. A team of law enforcement agents executed those
 21 warrants the following day.

22 18. During the search of YOEUN's home, agents located a USB thumb drive
 23 plugged into the television. A forensic preview of that thumb drive revealed it contained
 24 multiple files of child pornography, including the two below which were viewed and
 25 described to me by Special Agent Patrick Dospoy:

26 **FILE 1:** This image depicts a nude, prepubescent female lying on her back. She
 27 is shown inserting her right index finger into her vagina. Based on her youthful
 28 appearance, stature, lack of breast/muscular development, and lack of pubic/body
 hair, the child is estimated to be between seven and ten years old.

1 **FILE 2:** This image depicts a prepubescent female wearing a purple striped shirt
 2 and nude from the waist down. She is sitting with her left leg raised toward her
 3 head and right hand pulling her inner right thigh away from the left in order to
 4 expose her genitals to the camera. Her genitals are the focal point of the image.
 Based on her youthful appearance, stature, lack of body development, and lack of
 pubic/body hair, the child is estimated to be between seven and ten years old.

5 19. On the morning of March 6, 2019, I encountered YOEUN at Joint Base
 6 Lewis-McChord. I approached YOEUN and asked if he would be willing to answer a
 7 few questions. He agreed, and I advised him of his constitutional rights. After
 8 acknowledging he understood his rights, YOEUN participated in a recorded interview.
 9 Among other things, YOEUN acknowledged the following:

- 10 • YOEUN lives alone.
- 11 • YOEUN is the owner and user of SUBJECT ACCOUNTS 1-4 and used
 12 SUBJECT ACCOUNTS 1-3 to attempt to purchase minors for sex and/or
 13 seek out sexually explicit visual depictions of minors.
- 14 • YOEUN travelled to the Philippines in February 2019 and paid to have
 15 sexual contact with at least two minors, whom he estimated were twelve
 16 years old.

17 20. On March 11, 2019, I reviewed the contents of an extraction of YOEUN's
 18 iPhone, telephone number (224) 337-6686, pursuant to a search warrant. Upon reviewing
 19 the contents, I discovered SUBJECT ACCOUNT 5, another Facebook account apparently
 20 used by YOEUN. The account name was identified as "Moren Yuin" (UID:
 21 100034410908581).

22 21. On March 11, 2019, I conducted an Internet search for Facebook account
 23 "Morin Yuin" and found the following information, which was publicly available. The
 24 "Intro" section on the account reads, "It's Moeun." The account contains what appeared
 25 to be an image of YOEUN in his U.S. Army Physical Fitness uniform that was posted on
 26 February 27, 2019. The following images were found on the account including an image
 27 of U.S. Currency and foreign currency with a military nameplate that reads, "YOEUN."

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DO YOU KNOW MOREN?

To see what he shares with friends, send him a friend request.

Intro

It's Moeun

Photos

Friends 26

Faustino Klem, Crisabelle Vicente, Keeh Montedrario, Michael Dracos, Ian Chris Pineda, Aelvah Drea Endea Balbuena, Erica Reyes, Koi Pogi, Bryce S Emberga

Moren Yuin updated his profile picture.
February 27 at 1:35 AM

Moren Yuin updated his cover photo.
February 27 at 1:33 AM





22. While the information reported by Facebook did not include any
23 information to suggest YOEUN used SUBJECT ACCOUNT 5 to engage in illegal
24 activity, the other information shows that he used multiple Facebook accounts to engage
25 in these illicit activities previously. I therefore believe that SUBJECT ACCOUNT 5 may
26 contain evidence that will help to identify YOEUN and further tie him to the illegal
27 conduct reported by Facebook and/or may contain additional evidence of attempts by
28 YOEUN to sexually exploit minors.

29. I conducted an internet search for MOEUN YOEUN and found several
30 YouTube videos of YOEUN depicted with several different females. At least one of the
31 videos was labeled Borocay. I know Borocay to be an island in the Philippines.
32 According YouTube, this video was uploaded on or about August 9, 2016.

33. I also obtained travel records associated with MOEUN YOEUN from
34 Homeland Security Investigations. According to these records, YOEUN has been

1 traveling to and from east Asia since at least 2006. And these records show YOEUN
 2 traveled to the Philippines at least as early as 2012.

3 **VI. BACKGROUND REGARDING FACEBOOK'S SERVICES**

4 25. Facebook, Inc. owns and operates the free-access social networking website
 5 Facebook.com, accessed at <http://www.facebook.com>. Facebook allows its subscribers to
 6 establish personal accounts. Subscribers can then use their accounts to share written
 7 news, communications, photographs, videos, and other information with other Facebook
 8 users, and sometimes with the general public; to purchase and sell things, play games,
 9 and engage in numerous additional computer based activity.

10 26. A Facebook subscriber typically creates a personal profile using photos of
 11 him/herself and a name or nickname their friends and family know. This permits friends
 12 and family to find the subscriber's account. Facebook asks subscribers to provide basic
 13 contact information. This may include the subscriber's full name, birth date, contact e-
 14 mail addresses, physical address (city, state, zip code, and country), telephone numbers,
 15 screen names, associated websites, and other personal identifiers. Subscribers can list
 16 credit, debit or other financial account numbers for use when making purchases on or
 17 through Facebook. Facebook also asks subscribers to create an account password. The
 18 password, known only to the subscriber (and anyone to whom s/he gives it) limits access
 19 to the account. Only someone logged in with the password can change profile details,
 20 profile photographs or privacy settings.² Only a person who has logged into the account
 21 with a password can post on the "Wall,"³ send messages (similar to text messaging), or
 22 send friend requests under the identity of the account owner. Facebook subscribers rarely
 23 share the password to their accounts. There is little purpose in sharing passwords,
 24 because anyone whom the account owner permits can post messages on the user's "Wall."

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27 ²Subscribers must also be logged into their accounts to make purchases, post ads, make comments, adjust
 notifications they receive and to change other aspects of their accounts.

28 ³ A "Wall" in a particular subscriber's Facebook page is a space where the subscriber and his or her "Friends" (if
 permitted by the subscriber) can post and respond to status updates, check-ins, messages, images, attachments, and
 links.

1 27. Subscribers can select different levels of privacy for the communications
 2 and information associated with their Facebook accounts. By adjusting these privacy
 3 settings, a subscriber can make profile information, status updates, check-ins, and other
 4 posted material available only to himself or herself, to particular Facebook users, to all
 5 Facebook users, or to anyone with access to the Internet, including people who are not
 6 Facebook users.

7 28. Facebook subscribers can create personal profiles that include photographs,
 8 personal statistics such as birthdate, schooling, employer, lists of personal interests, and
 9 other information. Subscribers can also post “check-ins”⁴ and “status updates” about
 10 their whereabouts and actions, as well as links to videos, photographs, articles, and other
 11 items available elsewhere on the Internet. Facebook subscribers can also post
 12 information about upcoming “events,” such as social occasions, by listing the event’s
 13 time, location, host, and guest list.

14 29. A subscriber can also connect directly with individual Facebook users by
 15 sending each user a “Friend Request.” If the recipient of a “Friend Request” accepts the
 16 request, then the two users will become “Friends” for purposes of Facebook and can
 17 exchange communications or view information about each other. Each Facebook user’s
 18 account includes a list of that user’s “Friends” and a “News Feed,” which highlights
 19 information about the user’s “Friends,” such as status updates, check-ins, profile changes,
 20 and upcoming events. Subscribers may also join groups or networks to connect and
 21 interact with other users who are members of the same group or network. A Facebook
 22 network or group has options for adjusting privacy settings to grant or limit viewing or
 23 posting to the group’s page.

24 30. In Facebook’s Photos application, subscribers can upload an unlimited
 25 number of albums and photos. The Photos application can capture and store a geometric

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⁴ A “check-in” accesses the user’s mobile device GPS to let friends know exactly where the subscriber is.

1 representation of a face (Known as Faceprint data). Subscribers can “tag” (i.e., label)
 2 other Facebook users depicted in a photo or video. When a user is tagged in a photo or
 3 video, they receive a notification of the tag and a link to see the photo or video.

4 31. For Facebook’s purposes, a subscriber’s “Photoprint” includes all photos
 5 uploaded by that subscriber that have not been deleted, as well as all photos uploaded by
 6 any user that have that subscriber tagged in them. As uploaded, a digital photo often
 7 contains embedded data about when and where it was taken, and other information on its
 8 genesis. That information is called Exchangeable Image File Format (EXIF) information.
 9 Facebook “scrapes” this information off photos before placing them onto a page, but
 10 retains the original data.

11 32. Facebook users can exchange private messages on Facebook with other
 12 users. These messages, which are similar to e-mail messages, are sent to the recipient’s
 13 “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well
 14 as other information. Facebook users can also post comments on the Facebook profiles
 15 of other users or on their own profiles; such comments are typically associated with a
 16 specific posting or item on the profile.

17 33. Facebook captures and retains, for each subscriber account, data regarding
 18 the date, time, place, and IP addresses (IP Logs) used when the subscriber accesses
 19 his/her account; actions taken and items viewed while using the account; and subscriber
 20 geographic location, if that setting is enabled. This data cannot be manipulated by the
 21 subscriber. Facebook also retains, and makes available to the account subscriber, all
 22 information contained in Appendix A, attached and incorporated by reference. Material
 23 posted by the subscriber is retained by Facebook until sometime after it is deleted by the
 24 subscriber.

25 34. In Facebook jargon,

26 • Subscriber “Basic Contact Information” includes subscriber, name,
 27 birth date, email address(es), physical address (city, state, zip, country), all telephone
 28 numbers, screen name and any associated website;

1 • “Basic Subscriber Information (BSI)” is the subscriber’s
2 identification number, name, email address, date and time stamp of account creation,
3 registered cellular telephone number, record of recent logins, and whether the
4 subscriber’s page is publicly viewable; and
5 • A “Neoprint” is an expanded view of a given subscriber profile. It
6 includes subscriber profile contact information, friend lists; groups and networks of
7 which the subscriber is a member; “News Feed” information; “Wall” postings; status
8 updates; links to videos, photographs, articles, and other items; event postings; rejected
9 “Friend” requests; comments; messages; gifts; pokes; tags; and information about the
10 subscriber’s access and use of Facebook applications.

11 35. Facebook subscribers may communicate directly with Facebook about
12 issues relating to their account, such as technical problems, billing inquiries, or
13 complaints from the subscriber or other users. Social networking providers like
14 Facebook typically retain records about such communications, including records of
15 contacts between the subscriber and the provider’s support services, as well records of
16 any actions taken by the provider or subscriber as a result of the communications.

17 36. The company that operates Facebook.com is Facebook, Inc. Facebook, Inc.
18 has established a contact address for Law Enforcement and has asked law enforcement to
19 serve warrants either by using a website that Facebook has set up for use of law
20 enforcement, or by postal mail. The website, street address, and fax number are listed
21 above and incorporated here. Law enforcement regularly uses these to contact Facebook.

22 **VII. PAST EFFORTS TO OBTAIN THIS EVIDENCE**

23 37. Some of this evidence is available on digital devices seized as part of this
24 investigation. However, additional content and records are likely in the custody or
25 control of Facebook. In addition, preservation requests were submitted to Facebook
26 requesting they preserve all evidence related to the listed Facebook UID numbers
27 previously identified in paragraph 3.

28 **VIII. INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED**

1 38. Pursuant to Title 18, United States Code, Section 2703(g), this application
 2 and affidavit for a search warrant seeks authorization to permit Facebook, and their
 3 representatives and employees, to assist agents in the execution of these warrants. Once
 4 issued, the search warrants will be presented to Facebook with direction that they identify
 5 the accounts described in Attachment A, as well as other subscriber and log records
 6 associated with the SUBJECT ACCOUNTS, as set forth in Attachment B.

7 39. The search warrants will direct Facebook to create an exact copy of the
 8 specified accounts and records.

9 40. I, and/or other law enforcement personnel will thereafter review the copy of
 10 the electronically stored data, and identify from among that content those items that come
 11 within the items identified in Section II to Attachment B, for seizure.

12 41. Analyzing the data contained in the forensic image may require special
 13 technical skills, equipment, and software. It could also be very time-consuming.
 14 Searching by keywords, for example, can yield thousands of “hits,” each of which must
 15 then be reviewed in context by the examiner to determine whether the data is within the
 16 scope of the warrant. Merely finding a relevant “hit” does not end the review process.
 17 Keywords used originally need to be modified continuously, based on interim results.
 18 Certain file formats, moreover, do not lend themselves to keyword searches, as keywords,
 19 search text, and many common e-mail, database and spreadsheet applications do not store
 20 data as searchable text. The data may be saved, instead, in proprietary non-text format.
 21 And, as the volume of storage allotted by service providers increases, the time it takes to
 22 properly analyze recovered data increases, as well. Consistent with the foregoing,
 23 searching the recovered data for the information subject to seizure pursuant to this
 24 warrant may require a range of data analysis techniques and may take weeks or even
 25 months. All forensic analysis of the data will employ only those search protocols and
 26 methodologies reasonably designed to identify and seize the items identified in Section II
 27 of Attachment B to the warrant.

1 42. Based on my experience and training, and the experience and training of
2 other agents with whom I have communicated, it is necessary to review and seize a
3 variety of messenger communications, chat logs, files, payment records and documents,
4 that identify any users of the identified accounts and communications sent or received in
5 temporal proximity to incriminating messages that provide context to the incriminating
6 communications.

IX. CONCLUSION

8 43. Based on the forgoing, I request that the Court issue the proposed search
9 warrants. This Court has jurisdiction to issue the requested warrants because it is “a court
10 of competent jurisdiction” as defined by 18 U.S.C. § 2711. 18 U.S.C. §§ 2703(a),
11 (b)(1)(A) & (c)(1)(A). Specifically, the Court is “a district court of the United States . . .
12 that - has jurisdiction over the offense being investigated.” 18 U.S.C. § 2711(3)(A)(i).
13 Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not
14 required for the service or execution of this warrant. Accordingly, by this Affidavit and
15 Warrant, I seek authority for the government to search all of the items specified in
16 Section I, Attachment B, and specifically to seize all of the data, documents and records
17 that are identified in Section II to that same Attachment.

Kyle McNeal, Affiant
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me this 20th day of March, 2019.

Theresa L. Fricke
THERESA L. FRICKE
United States Magistrate Judge

ATTACHMENT A – Facebook, Inc. Accounts

The electronically stored data, information, and communications contained in, related to, and associated with, including all preserved data associated with Facebook, Inc. accounts:

- SUBJECT ACCOUNT 1: “Moeun Yoeun” (UID: 100014267529700)
- SUBJECT ACCOUNT 2: “Moeun Nobeatches” (UID: 100029529789553)
- SUBJECT ACCOUNT 3: “Moying Yoen” (UID: 100031404392100)
- SUBJECT ACCOUNT 4: “Moo Yo” (UID: 100000914824197)
- SUBJECT ACCOUNT 5: “Morin Yuin” (UID: 100034410908581)
- SUBJECT ACCOUNT 6: “J.C.” (UID: [REDACTED])
- SUBJECT ACCOUNT 7: “Y.C.” (UID: [REDACTED])

as well as all other subscriber and log records associated with the accounts, which are located at premises owned, maintained, controlled or operated by Facebook, Inc. a social media application provider headquartered at 1601 Willow Road, Menlo Park, California, 94025.

ATTACHMENT A - 1
USAO #2019R00192

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

ATTACHMENT B

FACEBOOK, INC. ACCOUNTS to be Searched

I. Information to be disclosed

4 To the extent that the information described in Attachment A related to the
5 Facebook, Inc. accounts to be searched is within the possession, custody, or control of
6 Facebook, Inc., including any communications, records, files, logs, posts, payment
7 records, or information that has been deleted but is still available to Facebook, Inc., or
8 has been preserved pursuant to requests made under 18 U.S.C. § 2703(f), Facebook, Inc.
9 is required to disclose the following information to the government for each Facebook,
10 Inc. account identifier listed in Attachment A:

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1 a. The contents of all communications associated with the accounts,
2 including stored or preserved copies of content sent to and from the account, draft
3 communications, the source and destination of any communications, the date and time at
4 which the communications were sent;

5 b. All records or other information regarding the identification of the
6 accounts, to include full name, physical address, telephone numbers and other identifiers,
7 records of session times and durations, the date on which the accounts were created, the
8 length of service, the IP address used to register the accounts, log-in IP addresses
9 associated with session times and dates, account status, alternative e-mail addresses
10 provided during registration, methods of connecting, log files, and means and source of
11 payment (including any credit or bank account number);

12 c. The types of service utilized;

13 d. All records or other information stored at any time by an individual
14 using the accounts, including address books, contact and buddy lists, calendar data,
15 pictures, files, and the contents of any accounts associated with the identified Facebook,
16 Inc. accounts; and

17 e. All records pertaining to communications between Facebook, Inc.
18 and any person regarding the accounts, including contacts with support services and
19 records of actions taken.

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1 **II. Information to be seized by the government**

2 All information described above in Section I that constitutes fruits, contraband,
3 evidence, and instrumentalities of violations of 18 U.S.C. § 2423(b) (Travel with Intent to
4 Engage in Illicit Sexual Conduct), 18 U.S.C. § 2251(a) (Production of Child
5 Pornography), 18 U.S.C. § 2252(a)(2) (Receipt/Distribution of Child Pornography), and
6 18 U.S.C. § 2252(a)(4)(B) (Possession of Child Pornography), committed in or after
7 2012, including, for each account or identifier listed in Attachment A, information
8 pertaining to the following matters:

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1 a. All messages, documents, and profile information, attachments, or
 2 other data that serves to identify any persons who use or access the accounts specified, or
 3 who exercise in any way any dominion or control over the specified accounts;

4 b. Any address lists or “friend”/contact lists associated with the
 5 specified accounts;

6 c. All images/videos of child pornography, any messages or documents
 7 relating to the transmission of child pornography (including any attachments thereto), and
 8 any profile information from other file- or photo-sharing websites;

9 d. All messages, communications, or other documents related to the
 10 sexual exploitation or abuse of minors, travel for the purpose, or otherwise evidencing
 11 contact with minors or individuals purporting to be or otherwise facilitate contact with
 12 minors.

13 e. The types of services utilized;

14 f. All subscriber records associated with the specified accounts,
 15 including name, address, local and long distance telephone connection records, or records
 16 of session times and durations, length of service (including start date) and types of
 17 service utilized, telephone or instrument number or other subscriber number or identity,
 18 including any temporarily assigned network address, and means and source of payment
 19 for such service) including any credit card or bank account number;

20 g. Any and all other log records, including IP address captures,
 21 associated with the specified accounts; and

22 h. Any records of communications between Facebook, Inc., and any
 23 person about issues relating to the accounts, such as technical problems, billing inquiries,
 24 or complaints from other users about the specified accounts, including records of contacts
 25 between the subscriber and the provider’s support services, as well as records of any
 26 actions taken by the provider or subscriber as a result of the communications.

27 **Notwithstanding the criminal offenses defined under 18 U.S.C. §§ 2252 and 2252A,
 28 or any similar criminal offense, Facebook shall disclose information responsive to
 this warrant by mailing it to Federal Bureau of Investigation, Attn: Special Agent**

1 Kyle McNeal at 1145 Broadway, Suite #500, Tacoma, WA 98402 or via email to
2 kmcneal@fbi.gov.

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ATTACHMENT B - 5
USAO #2019R00192

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
RECORDS PURSUANT TO FEDERAL RULES OF
EVIDENCE 902(11) AND 902(13)**

I, _____, attest, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this certification is true and correct. I am employed by Facebook, and my title is _____. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Facebook. The attached records consist of _____.

consist of _____ | **GENERALLY DESCRIBE RECORDS (pages/CDs/megabytes)** | I further state that:

a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Facebook, and they were made by Facebook as a regular practice; and

b. such records were generated by Facebook electronic process or system that produces an accurate result, to wit:

1. the records were copied from electronic device(s), storage medium(s), or file(s) in the custody of Facebook in a manner to ensure that they are true duplicates of the original records; and

2. the process or system is regularly verified by Facebook, and at all times pertinent to the records certified here the process and system functioned properly and normally.

1 I further state that this certification is intended to satisfy Rules 902(11) and
2 902(13) of the Federal Rules of Evidence.
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CERTIFICATE OF AUTHENTICITY - 2
USAO #2019R00192

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970